

UNITED STATES DISTRICT COURT FOR THE
EASTERN DISTRICT OF NEW YORK

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KEDWIN PAYAMPS,

Plaintiff,

**DEFENDANT'S
RESPONSE TO
PLAINTIFF'S FIRST SET
OF
INTERROGATORIES
AND DOCUMENT
REQUESTS**

INDEX NO.

22-cv-00563 (AMD) (VMS)

-against-

THE CITY OF NEW YORK; MAYOR BILL DE BLASIO;
NEW YORK CITY POLICE DEPARTMENT ("NYPD")
COMMISSIONER DERMOT SHEA; NYPD CHIEF OF
DEPARTMENT TERENCE MONAHAN; NYPD
INSPECTOR JESSE LANCE; NYPD OFFICER COREY
JOHNSON; FIRST NAME UNKNOWN ("FNU")
AUGUSTE (Tax I.D. 961629); and NYPD MEMBERS JOHN
AND JANE DOES 1-7,

Defendants.

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**DEFENDANT INSPECTOR JESSE LANCE'S
RESPONSE TO
PLAINTIFFS' FIRST SET OF
INTERROGATORIES AND DOCUMENT REQUESTS**

Defendant, New York City Police INSPECTOR JESSE LANCE (hereinafter referred to as "Defendant Inspector Lance") by his attorneys, La Pietra & Krieger, P.C., hereby provides his Reponses to Plaintiffs' First Set of Combined Interrogatories and Document Requests:

GENERAL STATEMENTS

- A. The information supplied in this Response is based solely upon the knowledge of

the executing party, and does not include the knowledge of other employees of Defendants and third parties.

B. The word usage and sentence structure is that of the attorneys for Defendant Inspector Lance who assisted in the preparation of this Response, and the language does not purport to be the exact language of the executing party.

C. In answering this Interrogatory Request, the best current knowledge, information and beliefs of Defendant Inspector Lance have been inquired into.

D. The terms used in this Response have the meanings established for them in Plaintiffs other pleadings and filings in this case.

E. Defendant Inspector Lance reserves his right to amend this Response based on information learned after the filing of this Response.

GENERAL OBJECTIONS

A. Defendant Inspector Lance objects to all of these Interrogatories and Document Requests as unduly burdensome, oppressive, overbroad and premature. The information sought in these Interrogatories is more properly the subject of a document request and/or depositions. In particular, many of these Interrogatories seek information which is contained in the documents requested by Plaintiffs which Defendant Inspector Lance is prepared to produce to the extent that said documents are within Defendant Inspector Lance's possession, in response to Plaintiffs' First Request for Production of Documents.

B. Moreover, the parties have already notified each other that they intend to take depositions. Detailed answers to interrogatory questions which will inevitably be repeated in the course of depositions serves no purpose other than causing Defendant Inspector Lance to expend time and money in preparing these Responses. Thus, these Interrogatories are repetitious, burdensome and harassing.

C. In addition, many of these Interrogatories and Document Requests seek information which cannot be properly provided until Plaintiffs have produced to Defendant Inspector Lance all of the documents to be requested by Defendant Inspector Lance, and until oral depositions before trial, including those of Plaintiffs' witnesses and of third parties, have been completed. Therefore, Defendant Inspector Lance reserves his right to respond more fully to these Interrogatories and Document Requests, if necessary, upon the completion of additional discovery.

**SPECIFIC RESPONSES TO INTERROGATORIES
OF DEFENDANT INSPECTOR LANCE**

**INTERROGATORY NO. 1: Identify each NYPD member who participated in or
who has Personal Knowledge regarding the NYPD's planning for policing the
Protest.**

Defendant Lance objects on the ground that the question is overbroad and thereby seeks information that is neither relevant to the issues in dispute in this action nor reasonably calculated to lead to the discovery of admissible evidence.

Subject to and without waiving this objection, Defendant Lance identifies the following ranking officers of the NYPD who may have knowledge of the planning for the policing of the protest:

NYPD Chief of Department Terrance Monahan.

**INTERROGATORY NO. 2: Identify each Incident Commander who was present
at the Protest, or who actually participated in the chain of command related to the
Protest from afar.**

Defendant Lance objects on the ground that the question is overbroad and thereby seeks information that is neither relevant to the issues in dispute in this action nor

reasonably calculated to lead to the discovery of admissible evidence.

Subject to and without waiving this objection, Defendant Lance states that he has examined all records in his custody and control, and none are responsive to this interrogatory.

INTERROGATORY NO. 3: Identify each member of the NYPD's Legal Bureau who was present at the Protest.

Defendant Lance objects on the ground that the question is overbroad and thereby seeks information that is neither relevant to the issues in dispute in this action nor reasonably calculated to lead to the discovery of admissible evidence.

Subject to and without waiving this objection, Defendant Lance states that he has examined all records in his custody and control, and none are responsive to this interrogatory.

INTERROGATORY NO. 4: Identify each member of the NYPD's Legal Bureau whom any Defendant consulted with in connection with the NYPD's response to the Protest, before or during the Protest.

Defendant Lance objects on the ground that the question is overbroad and thereby seeks information that is neither relevant to the issues in dispute in this action nor reasonably calculated to lead to the discovery of admissible evidence.

Subject to and without waiving this objection, Defendant Lance states that he has examined all records in his custody and control, and none are responsive to this interrogatory.

INTERROGATORY NO. 5: Identify each person who observed Plaintiff on June 4, 2020 prior to each Plaintiff's arrest.

Defendant Lance objects on the ground that the question is overbroad and thereby

seeks information that is neither relevant to the issues in dispute in this action nor reasonably calculated to lead to the discovery of admissible evidence.

Subject to and without waiving this objection, Defendant Lance states that he has examined all records in his custody and control, and none are responsive to this interrogatory.

INTERROGATORY NO. 6: Identify each person who has Personal Knowledge each Plaintiff's conduct on June 4, 2020 leading up to Plaintiff's arrest, including, but not limited to, any such conduct that any Defendant claims gave rise to, or contributed to, probable cause to arrest Plaintiff.

Defendant Lance objects on the ground that the question is overbroad and thereby seeks information that is neither relevant to the issues in dispute in this action nor reasonably calculated to lead to the discovery of admissible evidence.

Subject to and without waiving this objection, Defendant Lance states that he has examined all records in his custody and control, and none are responsive to this interrogatory.

INTERROGATORY NO. 7: Identify each law, statute, code provision, order, regulation, or other ground that any Defendant claims gave rise to, or contributed to, probable cause to arrest Plaintiff.

Defendant Lance objects to this request to the extent it seeks information and document that are part of the record in any public, administrative, or judicial proceeding, on the grounds that such documents are publicly available and are accessible to Plaintiff. No legitimate purpose would be served by requiring Defendant Lance to incur the time and expense required to provide such information or reproduce such documents.

Subject to and without waiving this objection. Defendant Lance states that he has

examined all records presently in his custody, possession and control and none are responsive to this interrogatory.

INTERROGATORY NO. 8: Identify each person who determined, or participated in the determination, that Plaintiff should be arrested.

Defendant Lance objects to this Document Request on the ground that the document request is overbroad and vague and thereby seeks information that is neither relevant to the issues in dispute in this action nor reasonably calculated to lead to the discovery of admissible evidence.

Subject to and without waiving this objection. Defendant Lance states that he has examined all records presently in his custody, possession and control and none are responsive to this interrogatory.

INTERROGATORY NO. 9: Identify each person who gave each alleged police order to Plaintiff on June 4, 2020 prior to Plaintiff's arrest, if Defendants claim any such order was given, including, but not limited to, any order(s) to disperse.

Defendant Lance objects to this Document Request on the ground that the document request is overbroad and vague and thereby seeks information that is neither relevant to the issues in dispute in this action nor reasonably calculated to lead to the discovery of admissible evidence.

Subject to and without waiving this objection. Defendant Lance states that he has examined all records presently in his custody, possession and control and none are responsive to this interrogatory.

INTERROGATORY NO. 10: If Plaintiff's arrest was a so-called "Turn-Over Arrest" within the meaning of the NYPD Patrol Guide, identify each NYPD member who played each of the roles described in the relevant Patrol Guide

provision, including, but not limited to, observing officer(s); assigning or other supervising officer(s); and assigned officer(s).

Defendant Lance objects to this Document Request on the ground that the document request is overbroad and vague and thereby seeks information that is neither relevant to the issues in dispute in this action nor reasonably calculated to lead to the discovery of admissible evidence.

Subject to and without waiving this objection. Defendant Lance states that he has examined all records presently in his custody, possession and control and none are responsive to this interrogatory.

INTERROGATORY NO. 11: Identify each person who placed Plaintiff in handcuffs.

Defendant Lance objects to this Document Request on the ground that the document request is overbroad and vague and thereby seeks information that is neither relevant to the issues in dispute in this action nor reasonably calculated to lead to the discovery of admissible evidence.

Subject to and without waiving this objection. Defendant Lance states that he has examined all records presently in his custody, possession and control and none are responsive to this interrogatory.

INTERROGATORY NO. 12: Identify each person who used physical force in any manner on Plaintiff on June 4, 2020 prior to or in connection with Plaintiff's arrest.

Defendant Lance objects to this Document Request on the ground that the document request is overbroad and vague and thereby seeks information that is neither relevant to the issues in dispute in this action nor reasonably calculated to lead to the discovery of admissible evidence.

Subject to and without waiving this objection. Defendant Lance states that he used only reasonable, lawful and necessary force which was limited to striking Plaintiff's backpack with a baton, in assisting in the arrest of Plaintiff. As to other persons, he has examined all records presently in his custody, possession and control and none are responsive to this interrogatory.

INTERROGATORY NO. 13: Identify each person who decided, or participated in deciding, whether Plaintiff would be processed for release with a C-Summons or Desk Appearance Ticket, or for arraignment.

Defendant Lance objects to this Document Request on the ground that the document request is overbroad and vague and thereby seeks information that is neither relevant to the issues in dispute in this action nor reasonably calculated to lead to the discovery of admissible evidence.

Subject to and without waiving this objection. Defendant Lance states that he has examined all records presently in his custody, possession and control and none are responsive to this interrogatory.

INTERROGATORY NO. 14: Identify each person who has Personal Knowledge related to Plaintiff's detention from arrest to release with a Desk Appearance Ticket, C-Summons, or after arraignment, including, but not limited to, each step of Plaintiff's arrest processing.

Defendant Lance objects to this Document Request on the ground that the document request is overbroad and vague and thereby seeks information that is neither relevant to the issues in dispute in this action nor reasonably calculated to lead to the discovery of admissible evidence.

Subject to and without waiving this objection. Defendant Lance states that he has

examined all records presently in his custody, possession and control and none are responsive to this interrogatory.

INTERROGATORY NO. 15: Identify each NYPD agent who assisted in or supervised the Individual Defendants' creation of arrest processing paperwork related to the Incident, including, but not limited to, Activity Log/Memo Book entries, Online Booking System Arrest Report ("OLBS") Reports, and C-Summons.

Defendant Lance objects to this Document Request on the ground that the document request is overbroad and vague and thereby seeks information that is neither relevant to the issues in dispute in this action nor reasonably calculated to lead to the discovery of admissible evidence.

Subject to and without waiving this objection. Defendant Lance states that he himself is not required to maintain a mo book, and that furthermore, has examined all records presently in his custody, possession and control and none are responsive to this interrogatory.

INTERROGATORY NO. 16: For each Individual Defendant who was involved in processing Plaintiff's arrest, identify each NYPD agent with whom that Individual Defendant consulted in creating arrest processing paperwork related to the Protest.

Defendant Lance objects to this Document Request on the ground that the document request is overbroad and vague and thereby seeks information that is neither relevant to the issues in dispute in this action nor reasonably calculated to lead to the discovery of admissible evidence.

Subject to and without waiving this objection. Defendant Lance states that he has

examined all records presently in his custody, possession and control and none are responsive to this interrogatory.

INTERROGATORY NO. 17: Identify each NYPD Legal Bureau agent who was present at the location at which Plaintiff's arrest was processed.

Defendant Lance objects to this Document Request on the ground that the document request is overbroad and vague and thereby seeks information that is neither relevant to the issues in dispute in this action nor reasonably calculated to lead to the discovery of admissible evidence.

Subject to and without waiving this objection. Defendant Lance states that he has examined all records presently in his custody, possession and control and none are responsive to this interrogatory.

INTERROGATORY NO. 18: For each NYPD member who consulted with a NYPD Legal Bureau attorney in connection with Plaintiff's arrest processing, identify each such NYPD Legal Bureau attorney.

Defendant Lance objects to this Document Request on the ground that the document request is overbroad and vague and thereby seeks information that is neither relevant to the issues in dispute in this action nor reasonably calculated to lead to the discovery of admissible evidence.

Subject to and without waiving this objection. Defendant Lance states that he has examined all records presently in his custody, possession and control and none are responsive to this interrogatory.

INTERROGATORY NO. 19: Identify each author, and each person who contributed to, the factual narrative in each OLBS Report, C-Summons, and accusatory instrument created in connection with Plaintiff's arrest.

Defendant Lance objects to this Document Request on the ground that the document request is overbroad and vague and thereby seeks information that is neither relevant to the issues in dispute in this action nor reasonably calculated to lead to the discovery of admissible evidence.

Subject to and without waiving this objection. Defendant Lance states that he has examined all records presently in his custody, possession and control and none are responsive to this interrogatory.

INTERROGATORY NO. 20: Identify by name or by Arrest Number each third-party arrestee whose arrest each Individual Defendant was involved in effecting or processing.

Defendant Lance objects to this Document Request on the ground that the document request is overbroad and vague and thereby seeks information that is neither relevant to the issues in dispute in this action nor reasonably calculated to lead to the discovery of admissible evidence.

Subject to and without waiving this objection. Defendant Lance states that he has examined all records presently in his custody, possession and control and none are responsive to this interrogatory.

INTERROGATORY NO. 21: Identify by caption, venue, and docket number each legal proceeding in which an Individual Defendant was alleged to have engaged in abuse of their lawful authority, false swearing, false arrest, malicious prosecution, excessive force, assault, battery, or violation of any federal or state constitutional right or criminal law.

Defendant Lance objects to this Document Request on the ground that the document request is overbroad and vague and thereby seeks information that is neither

relevant to the issues in dispute in this action nor reasonably calculated to lead to the discovery of admissible evidence.

Subject to and without waiving this objection. Defendant Lance states that he has examined all records presently in his custody, possession and control and none are responsive to this interrogatory.

INTERROGATORY NO. 22: Identify each person to whom each Individual Defendant has made a statement related to Plaintiff's arrest, detention, or prosecution, including any uses of force related thereto.

Defendant Lance objects to this Document Request on the ground that the document request is overbroad and vague and thereby seeks information that is neither relevant to the issues in dispute in this action nor reasonably calculated to lead to the discovery of admissible evidence.

Subject to and without waiving this objection. Defendant Lance states that he has examined all records presently in his custody, possession and control and none are responsive to this interrogatory.

INTERROGATORY NO. 23: For each video produced related to the Protest, identify the portions depicting each Individual Defendant by providing the Bates Number and/or other identifying information for each such video, the name of the Individual Defendant and timestamp(s) of the footage in which that Individual Defendant appears.

Defendant Lance objects to this Document Request on the ground that the document request is overbroad and vague and thereby seeks information that is neither relevant to the issues in dispute in this action nor reasonably calculated to lead to the discovery of admissible evidence.

Subject to and without waiving this objection. Defendant Lance states that he has examined all records presently in his custody, possession and control and none are responsive to this interrogatory.

INTERROGATORY NO. 24: Identify NYPD Member FNU August (Tax ID 961629), whose role in the Incident is described in ¶ 9 and ¶¶ 55-57 of the Complaint.

Defendant Lance objects to this Document Request on the ground that the document request is overbroad and vague and thereby seeks information that is neither relevant to the issues in dispute in this action nor reasonably calculated to lead to the discovery of admissible evidence.

Subject to and without waiving this objection. Defendant Lance states that he has examined all records presently in his custody, possession and control and none are responsive to this interrogatory.

INTERROGATORY NO. 25: Identify NYPD Member Does # 1-7, whose roles in the Incident are described in ¶¶ 35-103 of the Complaint.

Defendant Lance objects to this Document Request on the ground that the document request is overbroad and vague and thereby seeks information that is neither relevant to the issues in dispute in this action nor reasonably calculated to lead to the discovery of admissible evidence.

Subject to and without waiving this objection. Defendant Lance states that he has examined all records presently in his custody, possession and control and none are responsive to this interrogatory.

**SPECIFIC RESPONSES TO DOCUMENT REQUESTS
OF DEFENDANT INSPECTOR LANCE**

DOCUMENT REQUEST NO. 1: Produce all documents identified or consulted in responding to the interrogatories above.

Defendant Lance objects to this Document Request on the ground that the document request is overbroad and thereby seeks information that is neither relevant to the issues in dispute in this action nor reasonably calculated to lead to the discovery of admissible evidence.

Subject to and without waiving this objection, Defendant Lance states that he has not reviewed any documents prior to responding to this Interrogatory.

DOCUMENT REQUEST NO. 2: Produce all documents reflecting intelligence, investigations, and other information gathered by or provided to the Individual Defendants, including Defendant Jesse Lance, or the NYPD related to the Protest, prior to the Protest, including, but not limited to, all NYPD intelligence documents and NYPD Intelligence Bureau and Counterterrorism Bureau documents, and all documents provided to the NYPD by other governmental or private entities..

Defendant Lance objects to this Document Request on the ground that the document request is overbroad and thereby seeks information that is neither relevant to the issues in dispute in this action nor reasonably calculated to lead to the discovery of admissible evidence.

Subject to and without waiving this objection, Defendant Lance has examined all records presently in his custody, possession and control has no documents responsive to this request.

DOCUMENT REQUEST NO. 3: Produce all documents, including spreadsheets and documents reflecting investigations, communications, or other information regarding, so-called “Scheduled” and “Unscheduled Events” on the date of the

Protest.

Defendant Lance objects to this Document Request on the ground that the document request is overbroad and thereby seeks information that is neither relevant to the issues in dispute in this action nor reasonably calculated to lead to the discovery of admissible evidence.

Subject to and without waiving this objection, Defendant Lance has examined all records presently in his custody, possession and control has no documents responsive to this request.

DOCUMENT REQUEST NO. 4: Produce all documents reflecting information within the NYPD's care, custody, or control related to proposed or potential protest-related events or incidents on June 4, 2020, including, but not limited to, the Protest, and including, but not limited to, reports, communications (including digital communications), and other documents containing any such information generated by or available to the NYPD's Intelligence Division or Counterterrorism Bureau.

Defendant Lance objects to this Document Request on the ground that the document request is overbroad and thereby seeks information that is neither relevant to the issues in dispute in this action nor reasonably calculated to lead to the discovery of admissible evidence.

Subject to and without waiving this objection, Defendant Lance has examined all records presently in his custody, possession and control has no documents responsive to this request.

DOCUMENT REQUEST NO. 5: Produce all documents, including internal NYPD communications, related to planning for policing the Protest, including, but not limited to:

- a. Requests for Detail and all responses and endorsements thereto;
- b. To/From memoranda, UF-49's, 49's, and letters;
- c. E-mails and other digital communications; and
- d. Any other documents reflecting information relied on by the NYPD in planning for policing the Protest, including, but not limited to, documents containing any such information generated by or available to the NYPD's Intelligence Division or Counterterrorism Bureau.

Defendant Lance objects to this Document Request on the ground that the document request is overbroad and thereby seeks information that is neither relevant to the issues in dispute in this action nor reasonably calculated to lead to the discovery of admissible evidence.

Subject to and without waiving this objection, Defendant Lance has examined all records presently in his custody, possession and control has no documents responsive to this request.

DOCUMENT REQUEST NO. 6: Produce all Detail Rosters including the Individual Defendants' names and all such Detail Rosters reflecting the identities of other NYPD members who were assigned to police the Protest, or who responded to or were actually involved in the police response to the Protest.

Defendant Lance objects to this Document Request on the ground that the document request is overbroad and thereby seeks information that is neither relevant to the issues in dispute in this action nor reasonably calculated to lead to the discovery of admissible evidence.

Subject to and without waiving this objection, Defendant Lance has examined all

records presently in his custody, possession and control has no documents responsive to this request.

DOCUMENT REQUEST NO. 7: Produce all June 4, 2020 Roll Calls for each NYPD Precinct out of which an Individual Defendant turned out on June 4, 2020.

Defendant Lance objects to this Document Request on the ground that the document request is overbroad and thereby seeks information that is neither relevant to the issues in dispute in this action nor reasonably calculated to lead to the discovery of admissible evidence.

Subject to and without waiving this objection, Defendant Lance has examined all records presently in his custody, possession and control has no documents responsive to this request.

DOCUMENT REQUEST NO. 8: Produce all documents reflecting the actual or intended deployment of NYPD barricades at the Protest or within in a ten-block radius of the Protest, including at the time and location of each Plaintiff's arrest.

Defendant Lance objects to this Document Request on the ground that the document request is overbroad and thereby seeks information that is neither relevant to the issues in dispute in this action nor reasonably calculated to lead to the discovery of admissible evidence.

Subject to and without waiving this objection, Defendant Lance has examined all records presently in his custody, possession and control has no documents responsive to this request.

DOCUMENT REQUEST NO. 9: Produce all documents reflecting the actual or intended deployment of NYPD vehicles to the Protest or within in a ten-block radius of the Protest, including at the time and location of each Plaintiff's arrest.

Defendant Lance objects to this Document Request on the ground that the document request is overbroad and thereby seeks information that is neither relevant to the issues in dispute in this action nor reasonably calculated to lead to the discovery of admissible evidence.

Subject to and without waiving this objection, Defendant Lance has examined all records presently in his custody, possession and control has no documents responsive to this request.

DOCUMENT REQUEST NO. 10: Produce all documents reflecting the actual or intended deployment of NYPD members, including SRG members, to the Protest or within in a ten-block radius of the Protest, including at the time and location of each Plaintiff's arrest, including, but not limited to, "204's", Operations Unit Detail Section Records, Detail Breakdown Sheet forms and other Detail Breakdown records; "Who's Who" documents; "Detail Overview" documents; "Force Figures" documents; NYPD overtime documents; and NYPD Office of Management Assistance and Planning ("OMAP") documents.

Defendant Lance objects to this Document Request on the ground that the document request is overbroad and thereby seeks information that is neither relevant to the issues in dispute in this action nor reasonably calculated to lead to the discovery of admissible evidence.

Subject to and without waiving this objection, Defendant Lance has examined all records presently in his custody, possession and control has no documents responsive to this request.

DOCUMENT REQUEST NO. 11: Produce all documents reflecting the conditions with respect to vehicular and/or pedestrian traffic within in a ten-block radius of the

Protest, including at the time and location of each Plaintiff's arrest.

Defendant Lance objects to this Document Request on the ground that the document request is overbroad and thereby seeks information that is neither relevant to the issues in dispute in this action nor reasonably calculated to lead to the discovery of admissible evidence.

Subject to and without waiving this objection, Defendant Lance has examined all records presently in his custody, possession and control has no documents responsive to this request.

DOCUMENT REQUEST NO. 12: Produce all videos related to Plaintiff's arrest or to the Protest, including, but not limited to, all:

- a. **NYPD body-worn camera footage related to the Protest, including, but not limited to, such footage from each Individual Defendant and every NYPD member within 30' of each Individual Defendant who created such footage related to the Incident or the Protest, along with all related audit trails and metadata;**
- b. **ARGUS footage;**
- c. **Footage captured by the NYPD's Technical Assistance Response Unit ("TARU");**
- d. **Footage captured by the NYPD's Aviation Unit; and**
- e. **All other video footage in Defendants' care, custody, or control.**

Defendant Lance objects to this Document Request on the ground that the document request is overbroad and thereby seeks information that is neither relevant to the issues in dispute in this action nor reasonably calculated to lead to the discovery of admissible evidence.

Subject to and without waiving this objection, Defendant Lance has examined all records presently in his custody, possession and control has no documents responsive to this request.

DOCUMENT REQUEST NO. 13: Produce all photographs related to the Protest depicting Plaintiff or Individual Defendant or created in connection with or that relates to or concerns Plaintiff's arrest, pre-arrest conduct, or arrest processing, including, but not limited to, all:

- a. Arrest and mass or large-scale arrest processing photographs, whether taken at the scene of the arrest; outside of or at a Mass Arrest Processing Center ("MAPC") or other NYPD location, or otherwise;
- b. Prisoner movement slips; and
- c. All other arrest processing, including MAPC, photographs.

Defendant Lance objects to this Document Request on the ground that the document request is overbroad and thereby seeks information that is neither relevant to the issues in dispute in this action nor reasonably calculated to lead to the discovery of admissible evidence.

Subject to and without waiving this objection, Defendant Lance has examined all records presently in his custody, possession and control has no documents responsive to this request.

DOCUMENT REQUEST NO. 14: Produce all Mass Arrest Pedigree Labels (PD244-093) created depicting Plaintiff or Individual Defendant or created in connection with or that relates to or concerns each Plaintiff's arrest, pre-arrest conduct, or arrest processing related to the Protest, including, but not limited to, any created by an Individual Defendant.

Defendant Lance objects to this Document Request on the ground that the document request is overbroad and thereby seeks information that is neither relevant to the issues in dispute in this action nor reasonably calculated to lead to the discovery of admissible evidence.

Subject to and without waiving this objection, Defendant Lance has examined all records presently in his custody, possession and control has no documents responsive to this request.

DOCUMENT REQUEST NO. 15: Produce all recorded (including NYPD) communications related to Plaintiff's arrest or the Protest, including, but not limited to:

- a. 911 calls related to the Protest, and all documents related to responses thereto;
- b. 311 calls related to the Protest, and all documents related to responses thereto;
- c. NYPD Citywide One, Citywide Two, or other internal NYPD communications channels, including, but not limited to, any such communications on channels identified in the NYPD's SRG Guide;
- d. Recorded communications that were considered for use, or that were used, over an NYPD Long Range Acoustic Device ("LRAD"), and all documents reflecting the author(s) of such statements and their potential or intended uses; and
- e. Texts, e-mails, and other digitally recorded communications.

Defendant Lance objects to this Document Request on the ground that the document request is overbroad and thereby seeks information that is neither relevant to

the issues in dispute in this action nor reasonably calculated to lead to the discovery of admissible evidence.

Subject to and without waiving this objection, Defendant Lance has examined all records presently in his custody, possession and control has no documents responsive to this request.

DOCUMENT REQUEST NO. 16: Produce all documents, including NYPD

Disorder Control Unit documents, related to LRAD deployments and uses, and identifying LRAD operators, at the Protest.

Defendant Lance objects to this Document Request on the ground that the document request is overbroad and thereby seeks information that is neither relevant to the issues in dispute in this action nor reasonably calculated to lead to the discovery of admissible evidence.

Subject to and without waiving this objection, Defendant Lance has examined all records presently in his custody, possession and control has no documents responsive to this request.

DOCUMENT REQUEST NO. 17: Produce all SPRINT reports related to the Protest.

Defendant Lance objects to this Document Request on the ground that the document request is overbroad and thereby seeks information that is neither relevant to the issues in dispute in this action nor reasonably calculated to lead to the discovery of admissible evidence.

Subject to and without waiving this objection, Defendant Lance has examined all records presently in his custody, possession and control has no documents responsive to this request.

DOCUMENT REQUEST NO. 18: Produce all Event Chronologies and Event Summaries related to the Protest.

Defendant Lance objects to this Document Request on the ground that the document request is overbroad and thereby seeks information that is neither relevant to the issues in dispute in this action nor reasonably calculated to lead to the discovery of admissible evidence.

Subject to and without waiving this objection, Defendant Lance has examined all records presently in his custody, possession and control has no documents responsive to this request.

DOCUMENT REQUEST NO. 19: Produce all ICAD Chronologies and reports related to the Protest.

Defendant Lance objects to this Document Request on the ground that the document request is overbroad and thereby seeks information that is neither relevant to the issues in dispute in this action nor reasonably calculated to lead to the discovery of admissible evidence.

Subject to and without waiving this objection, Defendant Lance has examined all records presently in his custody, possession and control has no documents responsive to this request.

DOCUMENT REQUEST NO. 20: Produce documents sufficient to interpret any NYPD codes included in any SPRINT reports, ICAD chronologies and reports, and event chronologies, including, but not limited to, any NYPD or other agency training manuals related to using and understanding such reports, such as user manuals or training materials related to the “I/NETDispatcher system.”

Defendant Lance objects to this Document Request on the ground that the

document request is overbroad and thereby seeks information that is neither relevant to the issues in dispute in this action nor reasonably calculated to lead to the discovery of admissible evidence.

Subject to and without waiving this objection, Defendant Lance has examined all records presently in his custody, possession and control has no documents responsive to this request.

DOCUMENT REQUEST NO. 21: Produce all documents created related to the Protest created at or through any of the following, including, but not limited to, any logs, summaries, and communications (including electronic communications):

- a. Any Command Post, Mobile Command Post, Incident Command Post, or THV;
- b. The Real Time Crime Center;
- c. Any Joint Operations Center; and
- d. Any other NYPD or joint operations or other, similar command.

Defendant Lance objects to this Document Request on the ground that the document request is overbroad and thereby seeks information that is neither relevant to the issues in dispute in this action nor reasonably calculated to lead to the discovery of admissible evidence.

Subject to and without waiving this objection, Defendant Lance has examined all records presently in his custody, possession and control has no documents responsive to this request.

DOCUMENT REQUEST NO. 22: Produce all documents reflecting internal NYPD communications related to Plaintiff's arrest or the Protest, including, but not limited to, all e-mails, text messages, phone call logs and recordings, and other

digital documents reflecting or regarding such internal NYPD communications, including, but not limited to, such documents concerning communications to or from the Individual Defendants.

Defendant Lance objects to this Document Request on the ground that the document request is overbroad and thereby seeks information that is neither relevant to the issues in dispute in this action nor reasonably calculated to lead to the discovery of admissible evidence.

Subject to and without waiving this objection, Defendant Lance has examined all records presently in his custody, possession and control has no documents responsive to this request.

DOCUMENT REQUEST NO. 23: Produce all documents related to requesting the deployment of the NYPD's TARU unit related to the Protest, including, but not limited to, any internal NYPD communications between the NYPD's Legal Bureau and TARU.

Defendant Lance objects to this Document Request on the ground that the document request is overbroad and thereby seeks information that is neither relevant to the issues in dispute in this action nor reasonably calculated to lead to the discovery of admissible evidence.

Subject to and without waiving this objection, Defendant Lance has examined all records presently in his custody, possession and control has no documents responsive to this request.

DOCUMENT REQUEST NO. 24: Produce all documents reflecting the creation or disposition of any NYPD TARU footage created related to the Protest, including, but not limited to, any such documents required by or referred to in the NYPD

Patrol Guide.

Defendant Lance objects to this Document Request on the ground that the document request is overbroad and thereby seeks information that is neither relevant to the issues in dispute in this action nor reasonably calculated to lead to the discovery of admissible evidence.

Subject to and without waiving this objection, Defendant Lance has examined all records presently in his custody, possession and control has no documents responsive to this request.

DOCUMENT REQUEST NO. 25: Produce all documents related to the deployment of the NYPD's Aviation Unit related to the Incident or the Protest.

Defendant Lance objects to this Document Request on the ground that the document request is overbroad and thereby seeks information that is neither relevant to the issues in dispute in this action nor reasonably calculated to lead to the discovery of admissible evidence.

Subject to and without waiving this objection, Defendant Lance has examined all records presently in his custody, possession and control has no documents responsive to this request.

DOCUMENT REQUEST NO. 26: Produce all documents reflecting the creation or disposition of any NYPD Aviation Unit footage created related to the Protest.

Defendant Lance objects to this Document Request on the ground that the document request is overbroad and thereby seeks information that is neither relevant to the issues in dispute in this action nor reasonably calculated to lead to the discovery of admissible evidence.

Subject to and without waiving this objection, Defendant Lance has examined all

records presently in his custody, possession and control has no documents responsive to this request.

DOCUMENT REQUEST NO. 27: Produce all documents reflecting NYPD uses of force related to Plaintiff or the Protest or any resulting injuries or medical treatment, including, but not limited to, any NYPD Threat, Resistance, and Injury Reports, AIDED reports, witness statements, Medical Treatment of Prisoner Forms, Central Booking Medical Screening Forms, Ambulance Call Reports, Computer Aided Dispatch documents, FDNY Pre-Hospital Care Reports, other ambulance, EMT, and medical records, and all other documents related to any such use of force or any resulting injuries or medical treatment.

Defendant Lance objects to this Document Request on the ground that the document request is overbroad and thereby seeks information that is neither relevant to the issues in dispute in this action nor reasonably calculated to lead to the discovery of admissible evidence.

Subject to and without waiving this objection, Defendant Lance has examined all records presently in his custody, possession and control has no documents responsive to this request.

DOCUMENT REQUEST NO. 28: If any Defendant claims any NYPD member was injured as a result of the Protest, produce any related Line of Duty injury paperwork, witness statements, ambulance, EMT, and medical records, and all other documents related to any such injury.

Defendant Lance objects to this Document Request on the ground that the document request is overbroad and thereby seeks information that is neither relevant to the issues in dispute in this action nor reasonably calculated to lead to the discovery of

admissible evidence.

Subject to and without waiving this objection, Defendant Lance has examined all records presently in his custody, possession and control has no documents responsive to this request.

DOCUMENT REQUEST NO. 29: Produce a version of the Mass Arrest Report related to the Protest redacted to exclude only the private, identifying information of non-parties, not Arrest #s or other non-private, identifying information.

Defendant Lance objects to this Document Request on the ground that the document request is overbroad and thereby seeks information that is neither relevant to the issues in dispute in this action nor reasonably calculated to lead to the discovery of admissible evidence.

Subject to and without waiving this objection, Defendant Lance has examined all records presently in his custody, possession and control has no documents responsive to this request.

DOCUMENT REQUEST NO. 30: Produce the Command Log from any NYPD Precinct or MAPC at which arrests were processed related to the Protest.

Defendant Lance objects to this Document Request on the ground that the document request is overbroad and thereby seeks information that is neither relevant to the issues in dispute in this action nor reasonably calculated to lead to the discovery of admissible evidence.

Subject to and without waiving this objection, Defendant Lance has examined all records presently in his custody, possession and control has no documents responsive to this request.

DOCUMENT REQUEST NO. 31: Produce all documents including statements made by each Individual Defendant or other witnesses related to Plaintiff's arrest or the Protest, including, but not limited to, all scratch and other NYPD arrest processing paperwork.

Defendant Lance objects to this Document Request on the ground that the document request is overbroad and thereby seeks information that is neither relevant to the issues in dispute in this action nor reasonably calculated to lead to the discovery of admissible evidence.

Subject to and without waiving this objection, Defendant Lance has examined all records presently in his custody, possession and control has no documents responsive to this request.

DOCUMENT REQUEST NO. 32: Produce all activity logs, memo book entries, daily activity reports, daily activity records, and other NYPD documents created by each Individual Defendant on the date of the Protest or that otherwise relate to Plaintiff's arrest or the Protest.

Defendant Lance objects to this Document Request on the ground that the document request is overbroad and thereby seeks information that is neither relevant to the issues in dispute in this action nor reasonably calculated to lead to the discovery of admissible evidence.

Subject to and without waiving this objection, Defendant Lance has examined all records presently in his custody, possession and control has no documents responsive to this request.

DOCUMENT REQUEST NO. 33: Produce all Prisoner Pedigree Cards (PD244-092) created related to the Protest, redacted to exclude the private, identifying

information of non-parties, aside from the Arrest Numbers associated with their arrests.

Defendant Lance objects to this Document Request on the ground that the document request is overbroad and thereby seeks information that is neither relevant to the issues in dispute in this action nor reasonably calculated to lead to the discovery of admissible evidence.

Subject to and without waiving this objection, Defendant Lance has examined all records presently in his custody, possession and control has no documents responsive to this request.

DOCUMENT REQUEST NO. 34: Produce all MAPC Intake Sheets created related to the Protest, redacted to exclude the private, identifying information of non-parties, aside from the Arrest Numbers associated with their arrests.

Defendant Lance objects to this Document Request on the ground that the document request is overbroad and thereby seeks information that is neither relevant to the issues in dispute in this action nor reasonably calculated to lead to the discovery of admissible evidence.

Subject to and without waiving this objection, Defendant Lance has examined all records presently in his custody, possession and control has no documents responsive to this request.

DOCUMENT REQUEST NO. 35: Produce all C-Summons created related to the Protest, redacted to exclude the private, identifying information of non-parties, aside from the Arrest Numbers associated with their arrests.

Defendant Lance objects to this Document Request on the ground that the document request is overbroad and thereby seeks information that is neither relevant to

the issues in dispute in this action nor reasonably calculated to lead to the discovery of admissible evidence.

Subject to and without waiving this objection, Defendant Lance has examined all records presently in his custody, possession and control has no documents responsive to this request.

DOCUMENT REQUEST NO. 36: Produce all Online Booking Sheet (“OLBS”) printouts concerning arrests related to the Protest, redacted to exclude the private, identifying information of non-parties, aside from the Arrest Numbers associated with their arrests.

Defendant Lance objects to this Document Request on the ground that the document request is overbroad and thereby seeks information that is neither relevant to the issues in dispute in this action nor reasonably calculated to lead to the discovery of admissible evidence.

Subject to and without waiving this objection, Defendant Lance has examined all records presently in his custody, possession and control has no documents responsive to this request.

DOCUMENT REQUEST NO. 37: Produce all OLBS Arrest Worksheets (PD 244-159) (including any scratch and/or handwritten OLBS Arrest Worksheets) related to the Protest, redacted to exclude the private, identifying information of non-parties, aside from the Arrest Numbers associated with their arrests.

Defendant Lance objects to this Document Request on the ground that the document request is overbroad and thereby seeks information that is neither relevant to the issues in dispute in this action nor reasonably calculated to lead to the discovery of admissible evidence.

Subject to and without waiving this objection, Defendant Lance has examined all records presently in his custody, possession and control has no documents responsive to this request.

DOCUMENT REQUEST NO. 38: Produce all Complaint Reports (PD 313-152) and Complaint Report Worksheet(s) (PD 313-152A) related to the Protests, redacted to exclude the private, identifying information of non-parties, aside from the Arrest Numbers associated with their arrests.

Defendant Lance objects to this Document Request on the ground that the document request is overbroad and thereby seeks information that is neither relevant to the issues in dispute in this action nor reasonably calculated to lead to the discovery of admissible evidence.

Subject to and without waiving this objection, Defendant Lance has examined all records presently in his custody, possession and control has no documents responsive to this request.

DOCUMENT REQUEST NO. 39: Produce all Desk Appearance Tickets (PD 260-121) related to the Protest, redacted to exclude the private, identifying information of non-parties, aside from the Arrest Numbers associated with their arrests.

Defendant Lance objects to this Document Request on the ground that the document request is overbroad and thereby seeks information that is neither relevant to the issues in dispute in this action nor reasonably calculated to lead to the discovery of admissible evidence.

Subject to and without waiving this objection, Defendant Lance has examined all records presently in his custody, possession and control has no documents responsive to this request.

DOCUMENT REQUEST NO. 40: Produce all Desk Appearance Ticket Investigation Sheets (PD 360-091) related to the Protest, redacted to exclude the private, identifying information of non-parties, aside from the Arrest Numbers associated with their arrests.

Defendant Lance objects to this Document Request on the ground that the document request is overbroad and thereby seeks information that is neither relevant to the issues in dispute in this action nor reasonably calculated to lead to the discovery of admissible evidence.

Subject to and without waiving this objection, Defendant Lance has examined all records presently in his custody, possession and control has no documents responsive to this request.

DOCUMENT REQUEST NO. 41: Produce all Property Clerk Invoices (PD 521-141) related to the Protest, redacted to exclude the private, identifying information of non-parties, aside from the Arrest Numbers associated with their arrests.

Defendant Lance objects to this Document Request on the ground that the document request is overbroad and thereby seeks information that is neither relevant to the issues in dispute in this action nor reasonably calculated to lead to the discovery of admissible evidence.

Subject to and without waiving this objection, Defendant Lance has examined all records presently in his custody, possession and control has no documents responsive to this request.

DOCUMENT REQUEST NO. 42: Produce all other NYPD records reflecting the disposition of any property seized from any Plaintiff related to the Protest, including, but not limited to, any NYPD Property and Evidence Tracking System

(“PETS”) documents.

Defendant Lance objects to this Document Request on the ground that the document request is overbroad and thereby seeks information that is neither relevant to the issues in dispute in this action nor reasonably calculated to lead to the discovery of admissible evidence.

Subject to and without waiving this objection, Defendant Lance has examined all records presently in his custody, possession and control has no documents responsive to this request.

DOCUMENT REQUEST NO. 43: Produce all Online Prisoner Arraignment

(“OLPA”) Reports regarding arrests related to the Protest, redacted to exclude the private, identifying information of non-parties, aside from the Arrest Numbers associated with their arrests.

Defendant Lance objects to this Document Request on the ground that the document request is overbroad and thereby seeks information that is neither relevant to the issues in dispute in this action nor reasonably calculated to lead to the discovery of admissible evidence.

Subject to and without waiving this objection, Defendant Lance has examined all records presently in his custody, possession and control has no documents responsive to this request.

DOCUMENT REQUEST NO. 44: Produce all documents sufficient to identify each NYPD member (including any such supervisor(s)) who assisted in or supervised the Individual Defendants’ arrest processing, including their creation of arrest processing paperwork.

Defendant Lance objects to this Document Request on the ground that the

document request is overbroad and thereby seeks information that is neither relevant to the issues in dispute in this action nor reasonably calculated to lead to the discovery of admissible evidence.

Subject to and without waiving this objection, Defendant Lance has examined all records presently in his custody, possession and control has no documents responsive to this request.

DOCUMENT REQUEST NO. 45: Produce all documents, including internal NYPD communications, created after the Protest summarizing, critiquing, or evaluating events related to the Protest, including, but not limited to:

- a. Unusual Occurrence Reports;
- b. Unusual Incident Reports;
- c. After-Action Reports;
- d. To/From memoranda, UF-49's, 49's, and letters; and
- e. E-mails.

Defendant Lance objects to this Document Request on the ground that the document request is overbroad and thereby seeks information that is neither relevant to the issues in dispute in this action nor reasonably calculated to lead to the discovery of admissible evidence.

Subject to and without waiving this objection, Defendant Lance has examined all records presently in his custody, possession and control has no documents responsive to this request.

DOCUMENT REQUEST NO. 46: Produce all documents provided by any Individual Defendant to any prosecutor or court related to Plaintiff's arrest or the

Protest.

Defendant Lance objects to this Document Request on the ground that the document request is overbroad and thereby seeks information that is neither relevant to the issues in dispute in this action nor reasonably calculated to lead to the discovery of admissible evidence.

Subject to and without waiving this objection, Defendant Lance has examined all records presently in his custody, possession and control has no documents responsive to this request.

DOCUMENT REQUEST NO. 47: Produce all documents reflecting statements made by the Individual Defendants and any other person to a prosecutor or court related to Plaintiff or the Protest, including prosecutor's notes and criminal court accusatory instruments.

Defendant Lance objects to this Document Request on the ground that the document request is overbroad and thereby seeks information that is neither relevant to the issues in dispute in this action nor reasonably calculated to lead to the discovery of admissible evidence.

Subject to and without waiving this objection, Defendant Lance has examined all records presently in his custody, possession and control has no documents responsive to this request.

DOCUMENT REQUEST NO. 48: Produce all documents provided by any Individual Defendant or NYPD member related to Plaintiff's prosecution, or any prosecution arising from the Protest.

Defendant Lance objects to this Document Request on the ground that the document request is overbroad and thereby seeks information that is neither relevant to

the issues in dispute in this action nor reasonably calculated to lead to the discovery of admissible evidence.

Subject to and without waiving this objection, Defendant Lance has examined all records presently in his custody, possession and control has no documents responsive to this request.

DOCUMENT REQUEST NO. 49: Produce all documents related to or reflecting communications between a prosecutor or court and a Defendant related to Plaintiff's prosecution.

Defendant Lance objects to this Document Request on the ground that the document request is overbroad and thereby seeks information that is neither relevant to the issues in dispute in this action nor reasonably calculated to lead to the discovery of admissible evidence.

Subject to and without waiving this objection, Defendant Lance has examined all records presently in his custody, possession and control has no documents responsive to this request.

DOCUMENT REQUEST NO. 50: Produce all documents related to notifications to appear in New York City Criminal Court or New York State Supreme Court in connection with criminal prosecutions related to the prosecution of Plaintiff regarding the Protest, including, but not limited to, all Court Appearance Control System ("CACS") notifications related to Plaintiff's prosecutions created pursuant to NYPD Patrol Guide Provisions 211-04 and 211-05.

Defendant Lance objects to this Document Request on the ground that the document request is overbroad and thereby seeks information that is neither relevant to the issues in dispute in this action nor reasonably calculated to lead to the discovery of

admissible evidence.

Subject to and without waiving this objection, Defendant Lance has examined all records presently in his custody, possession and control has no documents responsive to this request.

DOCUMENT REQUEST NO. 51: Produce all documents related to attendance in New York City Criminal Court or New York State Supreme Court in connection with Plaintiff's prosecution related to the Incident, including, but not limited to, the Individual Defendants' Court Attendance Records (PD 468-141).

Defendant Lance objects to this Document Request on the ground that the document request is overbroad and thereby seeks information that is neither relevant to the issues in dispute in this action nor reasonably calculated to lead to the discovery of admissible evidence.

Subject to and without waiving this objection, Defendant Lance has examined all records presently in his custody, possession and control has no documents responsive to this request.

DOCUMENT REQUEST NO. 52: Produce copies of each discovery demand made pursuant to New York law or request to preserve or produce documents that were received by the NYPD from any prosecutor or defendant in connection with criminal prosecutions arising from Plaintiff's arrest or the Protest.

Defendant Lance objects to this Document Request on the ground that the document request is overbroad and thereby seeks information that is neither relevant to the issues in dispute in this action nor reasonably calculated to lead to the discovery of admissible evidence.

Subject to and without waiving this objection, Defendant Lance has examined all

records presently in his custody, possession and control has no documents responsive to this request.

DOCUMENT REQUEST NO. 53: Produce all documents reflecting or related to the dispositions of any criminal case brought against Plaintiff or related to the Protest, including, but not limited to, any such documents within the care, custody, or control of the NYPD's Criminal Justice Bureau.

Defendant Lance objects to this Document Request on the ground that the document request is overbroad and thereby seeks information that is neither relevant to the issues in dispute in this action nor reasonably calculated to lead to the discovery of admissible evidence.

Subject to and without waiving this objection, Defendant Lance has examined all records presently in his custody, possession and control has no documents responsive to this request.

DOCUMENT REQUEST NO. 54: Produce all documents reflecting or related to any decisions by a prosecutor or court to decline to prosecute, or to dismiss, any potential charges against arrestees at the Protest, including Plaintiff.

Defendant Lance objects to this Document Request on the ground that the document request is overbroad and thereby seeks information that is neither relevant to the issues in dispute in this action nor reasonably calculated to lead to the discovery of admissible evidence.

Subject to and without waiving this objection, Defendant Lance has examined all records presently in his custody, possession and control has no documents responsive to this request.

DOCUMENT REQUEST NO. 55: Produce all demands for preservation or litigation holds received or created by the NYPD related to the Protest, including, but not limited to, any such demands or holds created by the NYPD's Legal Bureau.

Defendant Lance objects to this Document Request on the ground that the document request is overbroad and thereby seeks information that is neither relevant to the issues in dispute in this action nor reasonably calculated to lead to the discovery of admissible evidence.

Subject to and without waiving this objection, Defendant Lance has examined all records presently in his custody, possession and control has no documents responsive to this request.

DOCUMENT REQUEST NO. 56: Produce all documents concerning each NYPD Civilian Complaint Review Board ("CCRB") complaint or investigation concerning the Protest, including, but not limited to, all such documents within the CCRB's care, custody, or control, including, but not limited to, the CCRB Complaint Report; CTS+ Logs; Closing Report; and all underlying documents and communications, including e-mails, related to each such complaint or investigation.

Defendant Lance objects to this Document Request on the ground that the document request is overbroad and thereby seeks information that is neither relevant to the issues in dispute in this action nor reasonably calculated to lead to the discovery of admissible evidence.

Subject to and without waiving this objection, Defendant Lance has examined all records presently in his custody, possession and control has no documents responsive to this request.

DOCUMENT REQUEST NO. 57: Produce all documents concerning each NYPD

Internal Affairs Bureau (“IAB”) complaint or investigation concerning the Incident and/or the Protest.

Defendant Lance objects to this Document Request on the ground that the document request is overbroad and thereby seeks information that is neither relevant to the issues in dispute in this action nor reasonably calculated to lead to the discovery of admissible evidence.

Subject to and without waiving this objection, Defendant Lance has examined all records presently in his custody, possession and control has no documents responsive to this request.

DOCUMENT REQUEST NO. 58: Produce all documents concerning any other complaint received, or investigation or prosecution – actual or potential - concerning the Protest undertaken by the City of New York or any of its agencies, including, but not limited to, all such documents related to any Individual Defendant.

Defendant Lance objects to this Document Request on the ground that the document request is overbroad and thereby seeks information that is neither relevant to the issues in dispute in this action nor reasonably calculated to lead to the discovery of admissible evidence.

Subject to and without waiving this objection, Defendant Lance has examined all records presently in his custody, possession and control has no documents responsive to this request.

DOCUMENT REQUEST NO. 59: Produce all documents concerning any other complaint received, or investigation or prosecution – actual or potential -

concerning the Protest undertaken by any other State, Federal, or other entity, including, but not limited to, all such documents related to any Individual Defendant.

Defendant Lance objects to this Document Request on the ground that the document request is overbroad and thereby seeks information that is neither relevant to the issues in dispute in this action nor reasonably calculated to lead to the discovery of admissible evidence.

Subject to and without waiving this objection, Defendant Lance has examined all records presently in his custody, possession and control has no documents responsive to this request.

DOCUMENT REQUEST NO. 60: Produce each Individual Defendant's NYPD Academy transcript.

Defendant Lance objects to this Document Request on the ground that the document request is overbroad and thereby seeks information that is neither relevant to the issues in dispute in this action nor reasonably calculated to lead to the discovery of admissible evidence.

Subject to and without waiving this objection, Defendant Lance has examined all records presently in his custody, possession and control has no documents responsive to this request.

DOCUMENT REQUEST NO. 61: Produce each Individual Defendant's current NYPD Personnel Profile Report – All History.

Defendant Lance objects to this Document Request on the ground that the document request is overbroad and thereby seeks information that is neither relevant to the issues in dispute in this action nor reasonably calculated to lead to the discovery of

admissible evidence.

Subject to and without waiving this objection, Defendant Lance has examined all records presently in his custody, possession and control has no documents responsive to this request.

DOCUMENT REQUEST NO. 62: Produce each Individual Defendant's current NYPD Central Personnel Index ("CPI") report.

Defendant Lance objects to this Document Request on the ground that the document request is overbroad and thereby seeks information that is neither relevant to the issues in dispute in this action nor reasonably calculated to lead to the discovery of admissible evidence.

Subject to and without waiving this objection, Defendant Lance has examined all records presently in his custody, possession and control has no documents responsive to this request.

DOCUMENT REQUEST NO. 63: Produce each Individual Defendant's current NYPD IAB resume and all related NYPD documents, including communications and documents reflecting the ultimate disposition of each IAB complaint or investigation, whether created within the NYPD's IAB or otherwise.

Defendant Lance objects to this Document Request on the ground that the document request is overbroad and thereby seeks information that is neither relevant to the issues in dispute in this action nor reasonably calculated to lead to the discovery of admissible evidence.

Subject to and without waiving this objection, Defendant Lance has examined all records presently in his custody, possession and control has no documents responsive to this request.

DOCUMENT REQUEST NO. 64: Produce each Individual Defendant's current CCRB history and all underlying CCRB documents, including communications and documents reflecting the ultimate disposition of each IAB complaint or investigation.

Defendant Lance objects to this Document Request on the ground that the document request is overbroad and thereby seeks information that is neither relevant to the issues in dispute in this action nor reasonably calculated to lead to the discovery of admissible evidence.

Subject to and without waiving this objection, Defendant Lance has examined all records presently in his custody, possession and control has no documents responsive to this request.

DOCUMENT REQUEST NO. 65: Produce all documents concerning internal police disciplinary action, letters in the personnel file, command discipline A or B, charges and specifications, transfers, and/or warnings and admonishment against any of the Individual Defendants, including, but not limited to, any GO-15 statements.

Defendant Lance objects to this Document Request on the ground that the document request is overbroad and thereby seeks information that is neither relevant to the issues in dispute in this action nor reasonably calculated to lead to the discovery of admissible evidence.

Subject to and without waiving this objection, Defendant Lance has examined all records presently in his custody, possession and control has no documents responsive to this request.

DOCUMENT REQUEST NO. 66: Produce each Individual Defendant's complete NYPD personnel file.

Defendant Lance objects to this Document Request on the ground that the document request is overbroad and thereby seeks information that is neither relevant to the issues in dispute in this action nor reasonably calculated to lead to the discovery of admissible evidence.

Subject to and without waiving this objection, Defendant Lance has examined all records presently in his custody, possession and control has no documents responsive to this request.

DOCUMENT REQUEST NO. 67: Produce all documents reflecting any early intervention monitoring or force monitoring or NYPD or external monitoring any Individual Defendant has been subjected to during their time as a NYPD member.

Defendant Lance objects to this Document Request on the ground that the document request is overbroad and thereby seeks information that is neither relevant to the issues in dispute in this action nor reasonably calculated to lead to the discovery of admissible evidence.

Subject to and without waiving this objection, Defendant Lance has examined all records presently in his custody, possession and control has no documents responsive to this request.

DOCUMENT REQUEST NO. 68: Produce all Risk Assessment Information Liability System (“RAILS”) documents related to each Individual Defendant.

Defendant Lance objects to this Document Request on the ground that the document request is overbroad and thereby seeks information that is neither relevant to the issues in dispute in this action nor reasonably calculated to lead to the discovery of admissible evidence.

Subject to and without waiving this objection, Defendant Lance has examined all

records presently in his custody, possession and control has no documents responsive to this request.

DOCUMENT REQUEST NO. 69: Produce any notices of claim, 50-h transcripts and exhibits, pleadings, discovery requests and responses, deposition transcripts and exhibits, settlement agreements, and judgments from each civil lawsuit against each Individual Defendant identified in response to Interrogatory No. 19 above.

Defendant Lance objects to this Document Request on the ground that the document request is overbroad and thereby seeks information that is neither relevant to the issues in dispute in this action nor reasonably calculated to lead to the discovery of admissible evidence.

Subject to and without waiving this objection, Defendant Lance has examined all records presently in his custody, possession and control has no documents responsive to this request.

DOCUMENT REQUEST NO. 70: Produce any criminal court complaints, documents reflecting the dates or events at court proceedings, transcripts of testimony or proceedings, certificates or other proof of disposition, related to each criminal proceeding against each Individual Defendant identified in response to Interrogatory No. 19 above.

Defendant Lance objects to this Document Request on the ground that the document request is overbroad and thereby seeks information that is neither relevant to the issues in dispute in this action nor reasonably calculated to lead to the discovery of admissible evidence.

Subject to and without waiving this objection, Defendant Lance has examined all records presently in his custody, possession and control has no documents responsive to

this request.

DOCUMENT REQUEST NO. 71: Produce any other documents reflecting the training each Individual Defendant received, whether at the NYPD Academy or afterward, including, but not limited to, any Strategic Response Group (“SRG”) and/or Disorder Control Unit (“DCU”) training, related to the following topics:

- a. The First Amendment, including as it relates to demonstrations and protests;
- b. Dispersal orders;
- c. The need to give dispersal orders and a meaningful opportunity to comply with them before making certain arrests, including at a demonstration or protest;
- d. Protest policing tactics and operations;
- e. Disorder Control tactics and operations, including responses to civil disorder and riots;
- f. Strategic Response Group tactics and operations;
- g. Crowd control tactics and operations;
- h. Use of force, the force continuum, and de-escalation;
- i. Use of force reporting;
- j. Use of handcuffs, including flex-cuffs, including in connection with arrests made at a protest or demonstration;
- k. Tight cuffing injuries and the circumstances under which handcuffs, or flex-cuffs, should or must be loosened or removed;
- l. NYPD body-worn camera use, including the circumstances under which body-worn cameras are meant to be activated;
- m. Incident command, chain of command, command and control, and intended

operations during a demonstration or protest, Special Event, or Critical Incident;

- n. Probable cause to arrest or prosecute a person for any of the grounds identified in response to Interrogatory No. 7, including, but not limited to, the Curfew Orders;**
- o. Arrest processing, including, but not limited to, the creation of arrest processing documents;**
- p. Mass or large-scale arrest processing, including, but not limited to:**
 - i. The use of mass or large-scale arrest processing photographs;**
 - ii. The use of a Mass Arrest Processing Center (“MAPC”);**
 - iii. The intended roles of NYPD Legal Bureau Attorneys in mass or large-scale arrest processing; and**
 - iv. Documents created in connection with mass or large-scale arrest processing.**
- q. Investigations, including photographic and video surveillance, in connection with protests;**
- r. Eligibility for release with a C-Summons or Desk Appearance Ticket in both arrest processing and mass or large-scale arrest processing circumstances;**
- s. Implementation of the 2020 amendments to New York Criminal Procedure Law § 150.20;**
- t. Processing, including arrest and large-scale arrest processing steps and documents intended to be created, for release with a C-Summons or Desk Appearance Ticket in both arrest processing and mass or large-scale arrest processing circumstances;**

- u. The creation of NYPD arrest and arrest processing-related documents;
- v. COVID-19 NYPD, public, and/or arrestee safety protocols, including, but not limited to, any such protocols regarding the wearing of masks, social distancing, handwashing, social distancing, and any impacts created by the COVID-19 pandemic on NYPD arrests, arrest processing, large-scale arrest processing, or other operations;
- w. The nature, scope, and intended enforcement of the Curfew Orders that were in effect during the Protest, including related to dispersal orders and enforcement of the Curfew Orders against essential workers;

Defendant Lance objects to this Document Request on the ground that the document request is overbroad and thereby seeks information that is neither relevant to the issues in dispute in this action nor reasonably calculated to lead to the discovery of admissible evidence.

Subject to and without waiving this objection, Defendant Lance has examined all records presently in his custody, possession and control has no documents responsive to this request.

DOCUMENT REQUEST NO. 72: Produce all documents reflecting the training each Individual Defendant received, if any, whether at the NYPD Academy or afterward, whomever and wherever from, including, but not limited to, any command-level, in-service, executive level, or other training, related to the topics in Document Request No. 71.

Defendant Lance objects to this Document Request on the ground that the document request is overbroad and thereby seeks information that is neither relevant to

the issues in dispute in this action nor reasonably calculated to lead to the discovery of admissible evidence.

Subject to and without waiving this objection, Defendant Lance has examined all records presently in his custody, possession and control has no documents responsive to this request.

DOCUMENT REQUEST NO. 73: Produce all documents reflecting the NYPD's official policies that were in effect at the time, related to the topics in Document Request No. 71, including, but not limited to, any relevant NYPD Patrol Guide and Administrative Guide provisions.

Defendant Lance objects to this Document Request on the ground that the document request is overbroad and thereby seeks information that is neither relevant to the issues in dispute in this action nor reasonably calculated to lead to the discovery of admissible evidence.

Subject to and without waiving this objection, Defendant Lance has examined all records presently in his custody, possession and control has no documents responsive to this request.

DOCUMENT REQUEST NO. 74: Produce all press or news clips, social media postings, or Internet links gathered or received by the NYPD related to the Protest, including, but not limited to, any such documents or information gathered by the NYPD's Commissioner for Public Information ("DCPI"), Intelligence Division, Counterterrorism Bureau, or otherwise.

Defendant Lance objects to this Document Request on the ground that the document request is overbroad and thereby seeks information that is neither relevant to the issues in dispute in this action nor reasonably calculated to lead to the discovery of

admissible evidence.

Subject to and without waiving this objection, Defendant Lance has examined all records presently in his custody, possession and control has no documents responsive to this request.

DOCUMENT REQUEST NO. 75: Produce all documents reflecting or related to press inquiries, press statements, and interviews related to the Protest, including, but not limited to, documents reflecting to or related to any communications, such as statements made at press conference or in texts or e-mails, to or from then-Mayor de Blasio, the NYPD Commissioner at the time, any Individual Defendants, NYPD members assigned to the DCPI's Office, or other NYPD members.

Defendant Lance objects to this Document Request on the ground that the document request is overbroad and thereby seeks information that is neither relevant to the issues in dispute in this action nor reasonably calculated to lead to the discovery of admissible evidence.

Subject to and without waiving this objection, Defendant Lance has examined all records presently in his custody, possession and control has no documents responsive to this request.

DOCUMENT REQUEST NO. 76: Produce all documents reflecting the nature, scope, and intended enforcement of the Curfew Orders that were in effect during the Protest, including related to dispersal orders and enforcement of the Curfew Orders against essential workers.

Defendant Lance objects to this Document Request on the ground that the document request is overbroad and thereby seeks information that is neither relevant to the issues in dispute in this action nor reasonably calculated to lead to the discovery of

admissible evidence.

Subject to and without waiving this objection, Defendant Lance has examined all records presently in his custody, possession and control has no documents responsive to this request.

DOCUMENT REQUEST NO. 77: Produce all documents released by the NYPD, the CCRB, the Office of the Comptroller, or any other City agency pursuant to the Freedom of Information Law regarding the Protest.

Defendant Lance objects to this Document Request on the ground that the document request is overbroad and thereby seeks information that is neither relevant to the issues in dispute in this action nor reasonably calculated to lead to the discovery of admissible evidence.

Subject to and without waiving this objection, Defendant Lance has examined all records presently in his custody, possession and control has no documents responsive to this request.

DOCUMENT REQUEST NO. 78: Produce all documents received by the New York City Law Department related to the Protest pursuant to subpoena or to Plaintiff's authorization or Freedom of Information Law request or otherwise, including, but not limited to, criminal court files, prosecutors' files, rap sheets, medical records, and all other records from any source whatsoever, along with copies of the request(s) made by the Law Department for such documents and any related correspondence.

Defendant Lance objects to this Document Request on the ground that the document request is overbroad and thereby seeks information that is neither relevant to the issues in dispute in this action nor reasonably calculated to lead to the discovery of

admissible evidence.

Subject to and without waiving this objection, Defendant Lance has examined all records presently in his custody, possession and control has no documents responsive to this request.

DOCUMENT REQUEST NO. 79: Produce all documents Defendants intend to use at any deposition in this case, including for impeachment purposes.

Defendant Lance objects to this Document Request on the ground that the document request is overbroad and thereby seeks information that is neither relevant to the issues in dispute in this action nor reasonably calculated to lead to the discovery of admissible evidence.

Subject to and without waiving this objection, Defendant Lance has examined all records presently in his custody, possession and control has no documents responsive to this request.

DOCUMENT REQUEST NO. 80: Produce all documents Defendants intend to use at the time of trial, including for impeachment purposes.

Defendant Lance objects to this Document Request on the ground that the document request is overbroad and thereby seeks information that is neither relevant to the issues in dispute in this action nor reasonably calculated to lead to the discovery of admissible evidence.

Subject to and without waiving this objection, Defendant Lance has examined all records presently in his custody, possession and control has no documents responsive to this request.

Dated: White Plains, New York
October 19, 2022

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**CERTIFICATE OF
SERVICE**

The undersigned hereby certifies that on this 19th day of October 2022, a copy of defendant's foregoing First Set of Interrogatories and Request for Production of Documents was served via email upon the following:

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